

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF RHODE ISLAND**

In re

**Alliance Security Inc.**

Debtor

**Case No. 1:17-bk-11190 (DF)**

**Chapter 11**

Contingent Creditor, the Federal Trade Commission (“FTC” or “Commission”) hereby moves for a temporary stay of its pending motion to dismiss or convert the bankruptcy, which is presently set for an evidentiary hearing to be held on January 11, 2018. In support of this motion, counsel for the FTC states as follows:

1. At the end of the day on December 21, 2018, appropriations for the FTC expired. The FTC had sufficient carryover funds to continue operating through midnight on December 28. After that, the agency lacks appropriated funding, and does not know when funding will be restored.
2. Absent an appropriation, FTC attorneys are prohibited from working, even on a voluntary basis, “except for emergencies involving the safety of human life or the protection of property.” 31 U.S.C. § 1342.
3. Undersigned counsel for the FTC therefore requests that the Court stay all deadlines for the FTC’s pending motion to dismiss or convert the bankruptcy, including the evidentiary hearing, until Congress has restored appropriations to the FTC.
4. If this motion for a stay is granted, undersigned counsel will notify the Court as soon as Congress has appropriated funds for the FTC. The Commission requests that, at that point, all

current deadlines for the FTC's motion to dismiss or convert the bankruptcy be extended commensurate with the duration of the lapse in appropriations.

5. Counsel for Debtor, the U.S. Trustee's Office, and the Creditors Committee have authorized counsel for the FTC to state that Debtor has no objection to this motion.

Therefore, although we greatly regret any disruption caused to the Court and the other litigants, the FTC hereby moves to stay its motion to dismiss or convert the bankruptcy, and all associated deadlines, until FTC attorneys are permitted to resume their usual civil litigation function

Dated: December 31, 2018

Respectfully submitted,

/s/ Ian L. Barlow

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 31, 2018, I electronically filed the foregoing Notice of Appearance in the above-captioned matter with the Clerk of the Bankruptcy Court for the District of Rhode Island using the Court's electronic filing CM/ECF system. The following participants receive notice electronically:

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